

Filing # 195438403 E-Filed 04/03/2024 07:09:48 PM

IN THE CIRCUIT COURT IN AND FOR THE 17<sup>TH</sup> JUDICIAL CIRCUIT

BROWARD COUNTY, FLORIDA

CASE NUMBER: CACE-24-001650

Willie Jones Jr. Plaintiff(s)

v.

Broward Sheriff Office ET. AL Defendant

AMENDMENT TO COMPLAINT

Plaintiff, Willie Jones, sues defendants, Broward Sheriff Office, Broward County, Brittany Huff, Gerorgette Philippe, Correctional Medical Authority and alleges:  
(name)

- This is an action for damages in the amount of \$300,000.
- Plaintiff resides at 11570 Royal Palm Blvd, Coral Springs, FL 33065 in  
(address)

Broward County.

- Defendant resides at \_\_\_\_\_ in  
(address)

\_\_\_\_\_ County or Defendants are a Florida Corporation or employees doing business at 555 SE 1st Ave, Fort Lauderdale, FL 33301 in Broward County.  
(address)

- On January, 2022 - October 2023,

Broward Sheriff Office held the plaintiff Willie Jones in a pre-trial detention and obligated by Florida law, broward sheriff office own statute and United states of America's constitution to provide a safe and humane enviornment. During the incarceration , the defendant, Broward Sheriff Office, neglected, during multiple

incidents, to established adequate security and/or health care. Resulting in the  
myraid of physical torture , mental abuse and emotional trauma.

*(statement of facts on which claim for relief against defendant is based)*

- Plaintiff is entitled to relief from the defendant under the above facts on the basis of the defendant's Neligent security, mental distress, cruel and unusal  
punishment by  
*(legal basis for relief, i.e. negligence, breach of contract, etc.)*  
reason of United States Constitution Amendment 8, 42 U.S.C.A. s 1983, BSO  
Mission Statement , Florida Constitution Article I , all legislate holding BSO held  
responsible for the care of inmates in their custody. Violated civil  
rights

*(facts showing entitlement of plaintiff to relief from defendant)*

- The item(s) of \_\_\_\_\_ to which plaintiff is entitled to relief from  
defendant *(injury or damage)*  
include(s) \_\_\_\_\_

*(specify)*

- As a result, plaintiff requests judgement against defendant for damages, cost of  
suit, and any other further relief as the court may deem proper.

- Plaintiff, Willie Jones does demand a jury trial.  
(name)

*Dated: April 03, 2024*

*Print Name: Willie Jones*

*Address: 11570 Royal Palm Blvd. Coral Spings Fl.*

33065

*Phone: 754-314-8795*

Filing # 197978376 E-Filed 05/09/2024 01:19:25 PM

IN THE CIRCUIT COURT IN AND FOR THE 17<sup>TH</sup> JUDICIAL CIRCUIT

BROWARD COUNTY, FLORIDA

CASE NUMBER: CACE-24-001650

Willie Jones Jr. Plaintiff(s)

v.

Broward Sheriff Office ET. AL Defendant

AMENDMENT TO COMPLAINT

Plaintiff, Willie Jones, sues defendants, Broward Sheriff Office, Broward County, Brittany Huff, Gerorgette Philippe, Correctional Medical Authority and alleges:  
(name)

- This is an action for damages in the amount of \$600,000.
- Plaintiff resides at 11570 Royal Palm Blvd. Coral Springs, FL 33065 in  
(address)  
Broward County.
- Defendant resides at \_\_\_\_\_ in  
(address)  
\_\_\_\_\_ County or Defendants are a Florida Corporation or employees doing business at 555 SE 1st Ave, Fort Lauderdale, FL 33301 in Broward County.  
(address)
- On January, 2022 - October 2023,  
Broward Sheriff Office held the plaintiff Willie Jones in a pre-trial detention and obligated by Florida law, broward sheriff office own statute and United states of America's constitution to provide a safe and humane enviornment. During the incarceration , the defendant, Broward Sheriff Office, neglected, during multiple

incidents, to established adequate security and/or health care. Resulting in the  
myraid of physical torture , mental abuse and emotional trauma.

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*(statement of facts on which claim for relief against defendant is based)*

- Plaintiff is entitled to relief from the defendant under the above facts on the basis of the defendant's Neligent security, mental distress, cruel and unusal  
punishment by

*(legal basis for relief, i.e. negligence, breach of contract, etc.)*

reason of United States Constitution Amendment 8, 42 U.S.C.A. s 1983, BSO  
Mission Statement , Florida Constitution Article 1 , all legislate holding BSO held  
responsible for the care of inmates in their custody. Violated civil  
rights

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*(facts showing entitlement of plaintiff to relief from defendant)*

- The item(s) of \_\_\_\_\_ to which plaintiff is entitled to relief from  
defendant *(injury or damage)*  
include(s) \_\_\_\_\_

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*(specify)*

- As a result, plaintiff requests judgement against defendant for damages, cost of suit, and any other further relief as the court may deem proper.

- Plaintiff, Willie Jones \_\_\_\_\_ does demand a jury trial.  
(name)

*Dated: May 09, 2024*

*Print Name: Willie Jones*

*Address: 11570 Royal Palm Blvd. Coral Spings Fl.*

33065

*Phone: 754-314-8795*